

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of

Jukka HEISKA et al.

Serial No.: 09/699,863

Filed: October 30, 2000

For: Content Converter Portal

Examiner: Mauro Jr., T. J.
Group Art: 2143

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

SIR:

This is a Request for a Panel Review of Issues on Appeal in accordance with the Office Gazette Notice dated July 12, 2005. The present request is filed concurrently with a Notice of Appeal and is filed before an Appeal Brief. No amendments are being filed with this request.

Arguments supporting the Request for Review begin on page 2 of the present communication.

ARGUMENTS

This Notice of Appeal and Request is filed in response to the final Office Action dated August 9, 2006.

The matters to be reviewed are independent claims 8, 15, and 16 are obvious over U.S. Patent No. 6,901,437 (Li) in view of WO 00/039666 (Carlino).

Independent claim 8 is drawn to an apparatus for providing data services to mobile devices and recites “a data store associated with the content converter for storing indications of the characteristics of each terminal device”, “logic for adjusting content for the particular mobile terminal in the content converter according to the stored characteristics of the mobile terminal”, and “sending means for routing the adjusted content through the data network to said at least one gateway for forwarding to said particular mobile terminal”, the gateway being between the data network and a mobile telephone network.

The combined teachings of Li and Carlino fail to teach or suggest an apparatus with logic for converting information and sending means for routing the adjusted content through the data network, as recited in independent claim 8, because neither Li nor Carlino disclose that adjusted content is sent over the data network. In contrast, both Li and Carlino disclose that a device which converts content is directly connected to a wireless gateway.

The Examiner alleges that Li discloses that the adjusted content is sent through the data network at point 17. on page 7 of the Office Action. However, Li discloses that the information from an origin server is sent to the mobile cache 100 and stored in the object database 116, after which the dynamic information composer 120 composes the data in accordance with user preferences and layout specified in the user file (col. 2, lines 52-61). According to this section of Li, the adjusted content is not sent back to the internet 108. Rather, the adjusted content is forwarded

from the dynamic information composer 120 to the WAP Device 102 via the WAP Proxy Server 106. The Examiner seems to allege that the link through the internet is how Li discloses sending the adjusted content through the internet. However, the text of Li clearly discloses that the adjusted content is sent to the dynamic information composer 120 which is coupled directly to the WAP Proxy Server 106. From the dynamic information composer 120, there is no motivation whatsoever to send the adjusted content back through the Internet 108, because the dynamic information composer 120 is connected directly to the WAP Proxy Server 106. In view of the above remarks, Li fails to disclose sending the adjusted content to the WAP Proxy Server 106 through the Internet.

Furthermore, the Examiner acknowledges that Li fails to disclose “logic for adjusting content for the particular mobile terminal in the content converter according to the stored characteristics of the mobile terminal”, and “sending means for routing the adjusted content through the data network to said at least one gateway for forwarding to said particular mobile terminal”, as recited in independent claim 8.

Carlino fails to teach or suggest what Li lacks. Carlino discloses a method and system for converting content of electronic data for wireless services. According to Carlino, a content converter 16 is either an integral part of or connected directly to a wireless gateway 14, wherein the wireless gateway 14 is connected to both a computer network 20 and a wireless network (see page 14, line 19 to page 5, line 10; and Fig. 1 of Carlino). The content converter 16 of Carlino is connected to the wireless gateway for converting electronic documents to a format that is usable by the first wireless device 12 (see page 14, lines 7-9; and Fig. 1, of Carlino). In each of the embodiment disclosed by Carlino, the content converter 16 sends data to the wireless gateway 14 and receives data from the wireless gateway 14 (see Fig. 1; and page 14, lines 19-23 of Carlino). Since the content converter 16 of Carlino is either an integral part of or connected directly to the

wireless gateway 14, Carlino also fails to disclose, teach, or suggest “sending means for routing the adjusted content through the data network to said at least one gateway for forwarding to said particular mobile terminal”, as expressly recited in independent claim 8.

Accordingly, the combined teachings of Li and Carlino fails to teach or suggest “sending means for routing the adjusted content through the data network to said at least one gateway for forwarding to said particular mobile terminal”, as expressly recited in independent claim 8.

The Examiner alleges that the sending means recited in independent claim 8 is disclosed at page 33, lines 19-23 of Carlino. However, this portion of Carlino merely states that the converted content is sent via the mobile network. There is no disclosure teaching or suggestion that the converted content is sent from the content converter 16 to the gateway 14 over the data network. Accordingly, independent claim 8 is allowable over Li in view of Carlino.

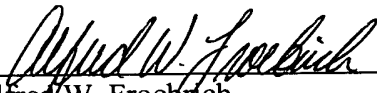
Independent claims 15 and 16 are also allowable over Li in view of Carlino because each of these claims now specifically requires that converted content is sent from the content converter to the gateway over the data network (WAN in claim 15). In contrast, both Li and Carlino disclose a content converter that is directly connected to the gateway or WAP proxy.

Dependent claims 9-14 and 17-23, each being dependent on one of independent claims 8, 15, and 16, are allowable for the same reasons expressed above with respect to independent claims 8, 15, and 16, as well as for the additional reasons contained therein.

In view of the above amendments and remarks, the application is now deemed to be in condition for allowance and notice to that effect is solicited.

It is believed that no additional fees or charges are required at this time in connection with the present application. However, if any additional fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
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